

# OSBORN LAW P.C.

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October 17, 2023

## VIA ECF

Honorable Valerie Figueredo  
United States District Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: *Nazario-Feliz v. Commissioner of Social Security*  
Civil Action No. 1:23-cv-06313-VF

Dear Judge Figueredo,

We write on behalf of plaintiff, Chery Nazario-Feliz, and with the consent of the defendant, to request additional time to file plaintiff's motion for judgment on the pleadings which is due on October 20, 2023 per the Court's July 24, 2023 Standing Scheduling Order. This is the parties' first request for an extension. Plaintiff's counsel is requesting this relief due to currently having 10 Social Security briefs and an Appellate Brief scheduled within the next two weeks.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- a. Plaintiff to file her motion for judgment on the pleadings on or before **January 25, 2024**;
- b. Defendant to file its response/cross-motion on or before **March 25, 2024**; and
- c. Plaintiff to file her reply (if any) on or before **April 8, 2024**.

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Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn  
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cc: Heetano Shamsoundar, Esq. (by ECF)

Application Granted



Valerie Figueredo, U.S.M.J.

DATED: October 18, 2023

The Clerk of Court is respectfully directed to terminate the motion at ECF No. 12.